

BEFORE THE
Federal Communications Commission

WASHINGTON, D.C.

ORIGINAL

RECEIVED

MAR 17 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)

Revision of the Commission's)
Rules to Ensure Compatibility)
with Enhanced 911 Emergency)
Calling Systems)

CC Docket No. 94-102
RM-8143

DOCKET FILE COPY ORIGINAL

REPLY COMMENTS OF AMSC SUBSIDIARY CORPORATION

AMSC Subsidiary Corporation ("AMSC") hereby replies to comments filed in the above-captioned proceeding proposing to require Commercial Mobile Radio Service ("CMRS") providers to make enhanced 911 services available to mobile radio callers.^{1/} AMSC has stated in its initial comments that it is willing and able to offer many of the features of enhanced 911 services on its domestic Mobile Satellite Service ("MSS") system. AMSC concurs with many of the commentors that filed in this proceeding, however, that compliance with the proposed automatic location information ("ALI") requirement is prohibitively expensive at this time.

Unlike terrestrial systems, MSS providers can fulfill the proposed ALI requirement only by integrating Global Positioning System ("GPS") capability into their service. The comments of

^{1/} Notice of Proposed Rulemaking, CC Docket No. 94-102, RM-8143, FCC 94-237 (October 19, 1994).

No. of Copies rec'd
List ABCDE

049

other satellite providers note that complying with this GPS mandate will add from \$200 to \$500 to the cost of the handsets used by these services. Several commentators noted that manufacturing new handsets with GPS capability would add several hundred dollars to the cost of the handsets. See Comments of Orbital Communications Corporation (January 9, 1995) at 4; Comments of Westinghouse Electric Corporation (January 9, 1995) at 6. AMSC estimated its cost of complying with the ALI requirement at \$500-\$1,000 because most of the AMSC transceivers will have already been manufactured and would require labor-intensive modifications.^{2/}

None of the comments presented any conflicting evidence as to the high cost of implementing ALI. Only one commentator specifically advocated applying the E911 proposals to MSS. Comments of the Interagency Committee on Search and Rescue (January 9, 1994) at 4. That entity conceded, however, that there is insufficient data available to determine that the benefits of such a requirement would outweigh the costs.

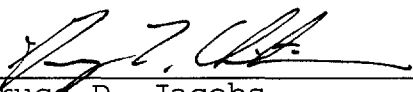
Therefore, based on the uncontroverted evidence of the high cost of adding ALI capability to MSS handsets, the Commission

^{2/} Other MSS commentators objected to the expense of the ALI requirement but did not give a projected cost of complying with the requirement. See Comments of Constellation Communications, Inc. (January 9, 1995) at 2; Comments of Leo One USA Corporation (January 9, 1995) at 2; Comments of Motorola, Inc. (January 9, 1995) at 10; Comments of TRW, Inc. (January 9, 1995) at 7.


should not adopt any requirements for enhanced 911 that would obligate AMSC or other MSS providers to incur such costs.

Respectfully submitted,

AMSC SUBSIDIARY CORPORATION



Bruce D. Jacobs
Glenn S. Richards
Guy T. Christiansen
Fisher Wayland Cooper
Leader & Zaragoza L.L.P.
2001 Pennsylvania Ave., N.W.
Washington, D.C. 20006
(202) 659-3494



Lon C. Levin
Vice President and
Regulatory Counsel
AMSC Subsidiary Corporation
10802 Park Ridge Boulevard
Suite 400
Reston, Virginia 22091
(703) 758-6000

Dated: March 17, 1995

Certificate of Service

I, Denise Sullivan, a secretary in the law firm of Fisher Wayland Cooper Leader & Zaragoza L.L.P., hereby certify that I have this 17th day of March, 1995, mailed copies of the foregoing "REPLY COMMENTS OF AMSC SUBSIDIARY CORPORATION" by first-class United States mail, postage prepaid, to the following:

Chairman Reed E. Hunt*
Federal Communications Commission
1919 M Street, NW
Room 814
Washington, D.C. 20554

Commissioner Andrew C. Barrett*
Federal Communications Commission
1919 M Street, NW
Room 826
Washington, D.C. 20554

Commissioner Susan Ness*
Federal Communications Commission
1919 M Street, NW
Room 832
Washington, D.C. 20554

Commissioner James H. Quello*
Federal Communications Commission
1919 M Street, NW
Room 802
Washington, D.C. 20554

Commissioner Rachelle B. Chong*
Federal Communications Commission
1919 M Street, NW
Room 844
Washington, D.C. 20554

Kathleen Willman, Chief*
Common Carrier Bureau
Federal Communications Commission
2033 M Street, NW
Room 8920
Washington, D.C. 20554

John Reed*
Office of Engineering and Technology
Federal Communications Commission
2025 M Street, NW
Room 7122C
Washington, D.C. 20554

Linda Dubroff*
Common Carrier Bureau
Federal Communications Commission
2025 Street, NW
Room 6008
Washington, D.C. 20554

William F. Adler
Steven N. Teplitz
Fleischman and Walsh, L.L.P.
1400 16th Street, N.W.
Washington, D.C. 20036

Michael J. Celeski
Vice President
Pertech America, Inc.
One Illinois Center
111 East Wacker Drive
Suite 500
Chicago, Illinois 60601

Charles J. Hinkle, Jr.
KSI Inc.
7630 Little River Turnpike
Suite 212
Annandale, Virginia 22003

David Kelley
VP Marketing
Terrapin Corporation
11958 Monarch Street
Garden Grove, California 92641

Susan H.R. Jones
Gardner, Carton & Douglas
1301 K Street, N.W.
Suite 900, East Tower
Washington, D.C. 20036

Jerome S. Caplan
Director of Compliance and

**System Certification
Redcom Laboratories
One Redcom Center
Victor, New York 14564-0995**

**Michael J. Miller, President
Telident, Inc.
4510 West 77th Street
Suite 101
Minneapolis, Minnesota 55435**

**O.C. Lee
Vice President
Proctor & Associates
15050 Northeast 36th
Redmond, Washington 98052-5317**

**Leonard Schuchman, President
Systems Integration Group
Stanford Telecom
1761 Business Center Drive
Reston, VA 22090**

**Michael J. Ceglia, President
KML Technology, Inc.
1008 Abington Rd.
Cherry Hill, N.J. 08034**

**Herbert A. Bustamante
Technical Director
Stanford Telecom
1221 Crossman Avenue
Sunnyvale, CA 94089-1117**

**Scott Wollaston, Esq.
Vice President and General Counsel
Siemens Rolm Communications, Inc.
4900 Old Ironsides Drive, M/S 103
P.O. Box 58075
Santa Clara, CA 95052-8075**

**David C. Jatlow
Young & Jatlow
Suite 600
2300 N Street, N.W.
Washington, D.C. 20037**

Dan Bart

Eric Schimmel
Ron Angner
Jesse Russell
Telecommunications Industry Association
2500 Wilson Boulevard, Suite 300
Arlington, VA 22201

R. Daniel Foley, Manager
Computer-Telephony Integration
Harris Digital Telephone Systems
300 Bel Marin Keys Blvd.
P.O. Box 1188
Novato, CA 94948-1188

Ed Hazelwood
Director of Public Safety and GIS
Elert & Associates
140 Third Street South
Stillwater, MN 55082

Robert A. Mazer
Rosenman & Colin
Suite 200, 1300 19th Street, N.W.
Washington, D.C. 20036

Albert Halprin
Stephen L. Goodman
Halprin, Temple & Goodman
Suite 650 East Tower
1100 New York Avenue, N.W.
Washington, D.C. 20005

Alicia A. McGlinchey
COMSAT Mobile Communications
22300 COMSAT Drive
Clarksburg, MD 20871

Michael D. Kelley
Michael A. Menius
Motorola, Inc.
1350 I Street N.W., Suite 400
Washington, DC 20005

Norman P. Leventhal
Stephen D. Baruch
David S. Keir
J. Breck Blalock
Leventhal, Senter & Lerman

2000 K Street, N.W.
Washington, D.C. 20006

Robert S. Koppel
Richard S. Whitt
IDB Mobile Communications, Inc.
15245 Shady Grove Road
Suite 460
Rockville, MD 20850

Raul R. Rodriguez
Stephen D. Baruch
Leventhal, Senter & Lerman
2000 K Street, N.W.
Washington, D.C. 20006

Ellen G. Block
Levine, Blaszak, Block & Boothby
1300 Connecticut Avenue, N.W.
Suite 500
Washington, D.C. 20036

Lisa M. Zaina
OPASTCO
21 Dupont Circle, N.W.
Washington, D.C. 20036

Robert M. Gurss
Wilkes, Artis, Hedrick & Lane,
Chartered
1666 K Street, N.W. #1100
Washington, D.C. 20006

James R. Hobson
Donelan, Cleary, Wood & Maser, P.C.
1100 New York Avenue, N.W. #750
Washington, D.C. 20036

Mark S. Johnson
National Association of
State EMS Directors
1947 Camino Vido Roble
Suite 202
Carlsbad, CA 92008

Forest A. Southwick
107 Bent Twig Road
Easley, SC 29642-9523

Randal R. Collett
President, ACUTA
152 West Zandale Drive, Suite 200
Lexington, KY 40503-2486

Alfred Sonnenstrahl
Telecommunications for the Deaf, Inc.
8719 Colesville Road, Suite 300
Silver Spring, MD 20910

Paul Rodgers
Charles D. Gray
James Bradford Ramsay
NARUC
1102 ICC Building
Post Office Box 684
Washington, D.C. 20044

Jeffrey L. Sheldon
Thomas E. Goode
UTC
1140 Connecticut Ave., N.W.
Suite 1140
Washington, D.C. 20036

Albert H. Kramer
Robert F. Aldrich
Keck, Mahin & Cate
1201 New York Avenue, N.W.
Penthouse Suite
Washington, D.C. 20005

R. Michael Senkowski
Jeffrey S. Linder
Ilene T. Weinreich
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

Scott Hong
667 Arbor Lane
Warminster, PA 18974

John Cusack
Executive Director
National SafeTalk Center
385 Airport Road, Suite A
Elgin, IL 60123

Philip G. Sailer
Pro-West & Associates
P.O. Box 812, Highway #371N.
Walker, Minnesota 56484

Jim Conran
Consumers First
P.O. Box 2346
Orinda, California 94563

Arthur A. Butler
Sara Siegel-Miller
Ater Winne Hewitt Dodson & Skerritt
601 Union Street, Suite 5450
Seattle, Washington 98101-2327

Brian R. Moir
Moir & Hardman
2000 L Street, N.W.
Suite 512
Washington, D.C. 20036

Danny E. Adams
Ann M. Plaza
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

Jeffrey S. Bork
U.S. West
1020 19th Street, N.W.
Suite 900
Washington, D.C. 20036

Andre J. Lachance
David J. Gudino
GTE Service Corporation
1850 M Street, N.W.
Suite 1200
Washington, D.C. 20036

Frank Michael Panek
Ameritech
Room 4H84
2000 West Ameritech Center Dr.
Hoffman Estates, IL 60196-1025

Edward R. Wholl

Jacqueline E. Holmes Nethersole
120 Bloomingdale Road
White Plains, NY 10605

Mark C. Rosenblum
Kathleen F. Carroll
Ernest A. Gleit
295 North Maple Avenue
Room 3261B3
Basking Ridge, N.J. 07920

Catherine A. Massey
William Covington
1150 Connecticut Avenue, N.W.
4th Floor
Washington, D.C. 20036

Betey L. Anderson
Bell Atlantic
1320 N. Court House Road, 8th fl.
Arlington, Virginia 20006

S. Mark Tuller
Bell Atlantic Mobile
180 Washington Valley Road
Bedminster, New Jersey 07921

William B. Barfield
Jim O. Llewellyn
1155 Peachtree Street, N.E.
Atlanta, Georgia 30309-3610

Charles P. Featherstun
David G. Richards
1133 21st Street, N.W. Suite 900
Washington, D.C. 20036

James P. Tuthill
Betsy Stover Granger
Pacific Bell
140 New Montgomery Street, Rm. 1525
San Francisco, California 94105

James L. Wurtz
Pacific Telesis
1275 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

James D. Ellis
Sr. Executive Vice President &
General Counsel
Mary Marks, Attorney
SBC Communications, Inc.
175 E. Houston, Suite 1306
San Antonio, TX 78205

Wayne Watts
Vice President and General Attorney
Bruce E. Beard, Attorney
Southwestern Bell Mobile Systems, Inc.
17330 Preston Rd.
Suite 100A
Dallas, TX 75252

Christine Johnson
Director, Joint Program Office
for Intelligent Transportation Systems
Federal Highway Administration
Department of Transportation
400 Seventh Street, S.W.
Washington, DC 20590

Paul R. Schwedler
Deputy Regulatory Counsel
Carl W. Smith
Chief Regulatory Counsel
Telecommunications, DoD
Defense Information Systems Agency
Code D01
701 S. Courthouse Road
Arlington, VA 22204

Joseph D. Hersey, Jr.
Chief, Maritime Radio and Spectrum
Management
Telecommunications Management Division
By Direction of the Commandant
Commandant (G-TMM)
United States Coast Guard
Washington, DC 20593-0001

G. A. Penington
Chairman, Interagency Committee
on Search and Rescue
United States Coast Guard

2100 Second Street, S.W.
Washington, DC 20593-0001

J. Ross Sherohman, President
National Emergency Number
Association-Texas Chapter
P.O. Box 632911
Nacogdoches, TX 75963-2911

Scott A. Sawyer
Assistant Attorney General
Thomas P. Perkins, Jr.
Assistant Attorney General
Rupaco T. Gonzalez
Assistant Attorney General
Scott J. Smyth
Assistant Attorney General
Richard A. Muscat
Assistant Attorney General
Consumer Protection Division
Public Agency Representation Section
State of Texas
P.O. Box 12548, Capitol Station
Austin, TX 78711-2548

David C. Yandell, Section Director
Technology and Operations Section
Emergency Management Division
Oregon State Police
595 Cottage St. NE
Salem, OR 97310

Ellen S. Levine
Peter Arth, Jr.
Edward W. O'Neill
Attorneys for the People of
the State of California and
the Public Utilities Commission
of the State of California
505 Van Ness Avenue
San Francisco, CA 94102

G. Kevin Carruth, Deputy Director
Planning and Construction Division
State of California
Department of Corrections
P.O. Box 942883
Sacramento, CA 94283-0001

Deborah T. Poritz
Attorney General of New Jersey
Alexander P. Waugh, Jr.
Executive Assistant Attorney General
Chairman, NJ9-1-1 Commission
S. Robert Miller
Director, OETS
Division of State Police
George N. Rover
Deputy Attorney General
Office of the Attorney General
New Jersey Department of Law and
Public Safety
State of New Jersey
Hughes Justice Complex
CN080
Trenton, NJ 08625-0080

Theodore I. Weintraub
Chairman, Maryland Emergency
Number Systems Board
Department of Public Safety and
Correctional Services
State of Maryland
Suite 209, Plaza Office Center
6776 Reisterstown Road
Baltimore, MD 21215-2341

Rolon W. Reed
Interim County Attorney
Information Services
E9-1-1 Telecommunications
County Administration Bldg., Room 154
P.O. Box 7800
Tavares, FL 32778-7800

James M. Dye
President, Georgia Chapter, A.P.C.O.
140 N. Marietta Pkwy.
Marietta, GA 30060

David Crowe
President
Cellular Networking Perspectives Ltd.
2636 Toronto Crescent, NW
Calgary, Alberta T2N3W1
CANADA

Naomi L. Wu, Communications Manager
Peninsula Communications
Port Angeles Police Department
321 East 5th Street
Port Angeles, WA 98362

James C. Quackenbush, Director
Thurston County Department of
Communications
2000 Lakeridge Drive S.W.
Olympia, WA 98502

Al J. Notzon III
Executive Director
Alamo Area Council of Governments
118 Broadway, Suite 400
San Antonio, TX 78205

Lyle V. Gallagher
State 9-1-1 Coordinator
Emergency Services Communication
System Advisory Committee
State of North Dakota
P.O. Box 5511
Bismarck, ND 58502-5511

Randall W. Lewis
Supervisor, Washington County
Emergency Communications District
401 Ashe Street
P.O. Box 448
Johnson City, TN 37605

Robert G. Oenning
Statewide E911 Program
State of Washington
1417 6th Avenue S.E.
P.O. Box 48346
Olympia, WA 98504-8346

Roy D. Meredith,
Past President
North Carolina Chapter of National
Emergency Number Association
P.O. Box 429
High Point, NC 27261-0429

**Thomas H. Bugbee
Bruce Malt
Regulatory Affairs
Telecommunications Branch
Information Technology Service
County of Los Angeles
P.O Box 2231
Downey, CA 90242**

**Bruce E. Thorburn
Information Services Director
E9-1-1 Telecommunications
Lake County, Florida
County Administration Bldg., Room 154
P.O. Box 7800
Tavares, FL 32778-7800**

**Richard L. Bullock, Director
Technical Services Center
911 Communications Division
Cowlitz County
312 S.W. First Avenue
Kelso, WA 98626-1724**

**Lorri Ann Ericson, Communications Manager
Puyallup City Communications
1531 39th Avenue, SE
Puyallup, WA 98374**

**Jerry E. Marshall
Executive Director
Bexar Metro
10715 Gulfdale
Suite 180
San Antonio, TX 78216**

**Michael L. King, Chief of Police
Anacortes Police Department
Anacortes Communications Center
1011 12th Street
Anacortes, WA 98221**

Marlys R. Davis
King County E-911 Program Manager
Computer and Communication Services
Division
Departement of Executive Administration
700 Fifth Avenue, Suite 2300
Seattle, WA 98104-5002

Martha Carter
9-1-1 Administrator
Caddo Parish Communications District
Number One
1144 Texas Avenue
Shreveport, LA 71101

Laverne Hogan
Executive Director
Greater Harris County 9-1-1
Emergency Network
602 Sawyer, Suite 710
Houston, TX 77007

Patricia M. Balduf
President
Jackson County Emergency
Communications District
600 Convent Ave.
Pascagoula, MS 39567

John F. Tharp
Executive Vice President
The Illinois Telephone Association
P.O. Box 730
300 East Monroe Street
Springfield, IL 62705

Jack Y. Sharp, President
Kentucky Emergency Number Association
1240 Airport Road
Frankfort, KY 40601

John Garner
Director
Shelby County 9-1-1 District
785 Crossover Lane, Suite 150
Memphis, TN 38117

B. J. Smith, Director
9-1-1 Emergency Telephone Operations
Hillsborough County, Florida
P.O. Box 1110
Tampa, FL 33601

Sheila C. Malone
Public Safety Communications Center
111 N. 3rd Street
Goshen, IN 46526

David L. Zeretzke, Director
Administrative Services
(Including E-9-1-1 Planning)
San Juan County
350 Court Street, #5
Friday Harbor, WA 98250

Daniel J. Aycock, Captain
Walla Walla Police Department
15 N. Third Street
Walla Walla, WA 99362

John Schroeder
Florida Chapter President
National Emergency Number Association
Pasco County Emergency Communications
8744 Government Drive
New Port Richey, FL 34654

Zach D. Taylor
Executive Director
9-1-1 Association of
Central Oklahoma Governments
Six Broadway Executive Park
6600 North Harvey Place, Suite 200
Oklahoma City, OK 73116-7913

Robert L. Williams, Jr., Director
City of Marietta
Emergency Communications
112 Hayes Street, Suite 911
Marietta, GA 30060

**Pete Luttrell, Director
Greene County, TN 9-1-1
Greene County Emergency
Communications District
111 Union Street
Greeneville, TN 37743**

**Captain John W. Beard
Commander King County Police Communications
President, Northwest Chapter APCO
King County Department of Public Safety
516 Third Avenue
Seattle, WA 98104-2312**

**Martin W. Bercovici
Keller and Heckman
1001 G Street, N.W.
Suite 500W
Washington, DC 20001-4545**

**Elizabeth R. Sachs, Esq.
American Mobile Telecommunications
Association, Inc.
1150 18th Street, N.W., Suite 250
Washington, DC 20036**

**Robert S. Foosaner
Senior Vice President -
Government Affairs
Lawrence R. Krevor
Director - Government Affairs
Laura L. Holloway
General Attorney
Nextel Communications, Inc.
800 Connecticut Ave., N.W.
Suite 1001
Washington, DC 20006**

**Jonathan D. Blake
Kurt A. Wimmer
Covington & Burling
1201 Pennsylvania Av., N.W.
Post Office Box 7566
Washington, DC 20044**

**Glenn S. Rabin
Alltel Mobile Communications, Inc.
655 15th Street, N.W.**

Suite 220
Washington, DC 20005

Gary O'Malley
Vice President
Cable Plus
11400 SE 6th Street, Suite 120
Bellevue, WA 98004

Michael F. Altschul
Vice President, General Counsel
Cellular Telecommunications
Industry Association
1250 Connecticut Avenue, N.W.
Suite 200
Washington, DC 20036

Peter M. Connolly
Koteen & Naftalin
1150 Connecticut Avenue
Washington, DC 20036

David L. Jones, Chairman
Government and Industry Affairs
Committee
Rural Cellular Association
2120 L Street, N.W., Suite 520
Washington, DC 20037

David L. Nace
Marci E. Greenstein
Lukas, McGowan, Nace & Gutierrez
Chartered
1111 19th Street, N.W.
Twelfth Floor
Washington, DC 20036

Randall S. Coleman
Cellular Telecommunications
Industry Association
1250 Connecticut Avenue, N.W.
Suite 200
Washington, DC 20036

Mark J. Golden
Vice President of Industry Affairs
1019 19th Street, N.W.
Suite 1100
Washington, DC 20036

Jean L. Kiddo
Shelley L. Spencer
Swidler & Berlin, Chtd.
3000 K Street, N.W.
Suite 300
Washington, DC 20007

Thomas Gutierrez
Lukas, McGowan, Nace & Gutierrez
Chartered
1111 19th Street, N.W.
Twelfth Floor
Washington, DC 20036

Adam A. Andersen
Senior Counsel
CMT Partners
651 Gateway Boulevard, 15th Fl.
South San Francisco, CA 94080

Gary Jones
JEM Co-Chair
Director of Standards Policy
Omnipoint Corporation
1365 Garden of the Gods Rd.
Colorado Springs, CO 80907

Mary A. Boyd
JEM Co-Chair
Executive Director
Texas Emergency Communications
Commission
1101 Capital of Texas Highway, South
Austin, TX 78749

Raymond G. Bender, Jr.
J.G. Harrington
Dow Lohnes & Albertson
1255 23rd Street, N.W.
Washington, DC 20037

Stephen A. Hildebrandt
Chief Counsel
Westinghouse Broadcasting Company, Inc.
1025 Connecticut Avenue, N.W. Suite 506
Washington, DC 20036-5405

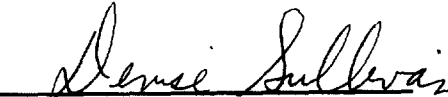
Stephen L. Goodman
Halprin, Temple & Goodman
1100 New York Avenue, N.W.
Suite 650 East
Washington, DC 20005

Joseph P. Blaschka, Jr., P.E.
ADCOM Engineering Company
14631 128th Avenue, N.E.
Woodinville, WA 98072

William T. Bradfield
President
Tendler Cellular
65 Atlantic Avenue
Boston, MA 02110

O.C. Lee
Vice President
Proctor & Associates
1050 Northeast 36th
Redmond, WA 98052-5317

Michael J. Ceglia
President
KML Technology, Inc.
1008 Abington Rd.
Cherry Hill, NJ 08034


Denise Sullivan

* By Hand Delivery